

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**DECLARATION OF CHRISTINA PULLO OF PRIME CLERK LLC
REGARDING SERVICE OF OBJECTION NOTICE AND PROCEDURES UPON
BENEFICIAL HOLDERS OF CHALLENGED GO BONDS**

I, CHRISTINA PULLO, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am Vice President of the Solicitation & Public Securities Department of Prime Clerk LLC ("Prime Clerk"), located at 830 Third Avenue, Ninth Floor, New York, New York 10022. I am over the age of eighteen years and not a party to the above-captioned cases.
2. Prime Clerk is the Solicitation, Notice, and Claims Agent retained by the Debtors in these Title III cases. I have more than nine (9) years of experience in the public securities and solicitation fields. My practice focuses on assisting clients with complex claims and securities

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

noticing and balloting, pre-packaged plan solicitations, out-of-court restructurings and corporate events in general, such as rights offerings, tender offers and treatment elections.

3. I am in charge of the Prime Clerk team responsible for soliciting votes with respect to any plan(s) of adjustment in these Title III cases filed by the Commonwealth or COFINA and for providing notice to the beneficial holders of the Commonwealth's general obligation bonds.

4. I will oversee the service of the Objection Notice and Objection Procedures upon those persons and entities that filed proofs of claims against the Commonwealth categorized as relating to Commonwealth public bonds, and upon the beneficial holders of the Challenged GO Bonds.² I make this declaration in connection with the Court's request made during the hearing on January 30, 2019 that the Objectors obtain a statement from Prime Clerk detailing its process for serving the Objection Notice and Objection Procedures upon the beneficial holders of the Challenged GO Bonds.

5. The first step in the notice process is for Prime Clerk to ask DTC and other depositories to prepare a report listing the "Participants" that hold the Challenged GO Bonds on behalf of one or more beneficial owners as of a designated record date. The Participants are comprised of banks, brokers, dealers and other financial institutions. The Participants hold the securities in "street name" on behalf of the beneficial holders (and other brokerage institutions that hold them on behalf of beneficial holders).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Urgent Motion of (I) Financial Oversight and Management Board, Acting Through the Special Claims Committee and (II) Official Committee of Unsecured Creditors, Under Bankruptcy Code s Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures With Respect to Omnibus Objection to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligation Bonds and Requesting Related Relief* (the "Procedures Motion"). [Docket No. 4788]

6. Prime Clerk's next step is to request that each Participant (directly or through its mailing agent) advise Prime Clerk of the number of paper copies of the Objection Notice and Objection Procedures such Participant/ mailing agent will need to provide notice of the same by mail to beneficial holders. In that regard, certain beneficial holders may have elected to receive notices electronically, and, as a result, the number of paper copies requested by the Participants may understate the precise number of beneficial holders.

7. Prime Clerk will next deliver the requisite number of paper copies of the Objection Notice and Objection Procedures by overnight mail to the Participants and/or the Participants' mailing agent, and the mailing agent (or Participant) will in turn forward them to the beneficial holders. Most Participants have mailing agents for this type of notice, and in that regard, more than ninety percent (90%) of such Participants utilize the services of Broadridge Financial Solutions ("Broadridge").

8. Based upon my experience, it takes approximately five (5) to seven (7) business days for the Participant or its mailing agent to send notices to the beneficial holders of securities. Most mailing agents, including Broadridge, will provide email notification when the mailings have been completed. Prime Clerk will request such notification to confirm that the mailing of the Objection Notice and Objection Procedures to beneficial holders of the Challenged GO Bonds has been completed.

9. The foregoing procedure is essentially the same procedure used when Prime Clerk solicits votes from beneficial holders of securities for a plan of reorganization or adjustment (including the COFINA plan of adjustment), and by solicitation agents in general when soliciting votes with respect to non-bankruptcy events, such as rights offerings, tender offers and treatment elections (although the Participants may use no mailing agent or a different mailing agent for

such non-bankruptcy events). In addition, I have overseen notice to beneficial holders of the Commonwealth's general obligation bonds previously in these Title III cases, which necessarily include the Challenged GO Bonds, and am aware of no problems with respect to such notice.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: February 4 , 2019
New York, New York

/s/ Christina Pullo